

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF PENNSYLVANIA**

JOSEPH DENHAM

Plaintiff,

v.

**THE CHILDREN'S HOSPITAL OF
PHILADELPHIA; *ET AL.***

Defendants.

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**CIVIL ACTION NO.
19-794**

PLAINTIFF'S PROPOSED VOIR DIRE

1. *Introduce the lawyers and the parties.* Do any of you know either/any of the lawyers?

Lane Schiff and Colin Saltry of Console Mattiacci Law LLC

[Defendant's Lawyers]

Have any of these attorneys or anyone in their offices ever represented you or brought any action against you?

Do you know **the Plaintiff, Joseph Denham?**

2. Do you have any belief or feeling towards any of the parties, their attorneys or the witnesses that might be regarded as a bias or prejudice for or against any of them?
3. Have you, or any family member or close friend, ever worked for Children's Hospital of Philadelphia, Children's Anesthesiology Associates, LTD, or any of their affiliated entities.
4. Have you, or any family member or close friend, ever worked for the University of Pennsylvania
5. Have you, or any family member or close friend, ever been a patient at CHOP or CAA?
6. Has anyone here worked for a hospital?

7. Some people have negative feelings about people that bring lawsuits; do you share this belief in any way?
8. I have already briefly described the case. Do you know anything about this case from any source other than what I've just told you?
9. Some folks disagree with the discrimination laws and believe that they are unfair to companies, please raise your hand if you lean toward this belief.
10. Have you, or any family member or close friend, ever worked in human resources or personnel administration?
11. Have you or any member of your family ever owned, operated or managed a business that had employees?
12. In your job, are you now, or have you in the past, been required to manage or supervise other employees?
13. Have you or anyone close to you ever been accused of engaging in illegal discrimination? That is, have you ever been accused of age, disability, or any other type of discrimination by someone else?
14. Does anyone here have any experience with accommodations for disabilities at their work, either as someone who has needed an accommodation themselves, someone who has worked with someone who requested an accommodation, or as a manager or HR person involved in accommodation requests?
15. Has anyone ever filed a claim or a lawsuit against you or a member of your family or a close friend?
16. Do you have, or have you had, a disability?
17. In cases like this, jurors hear about emotional pain and suffering and are asked how much money to allow for it. This means money for the fact that someone is having – and will in the future have - emotional pain. Some folks have some philosophical, moral or other reasons for not allowing money for emotional pain – and others are ok with it. Which are you a little closer to (or raise hand if you lean toward this view)?
18. Have you ever served on a trial jury before today, here in the Eastern District of Pennsylvania or in any state court or federal court?
19. Do you know anyone else in the jury box other than as a result of reporting here today?
20. Would your verdict in this case be influenced in any way by any factors other than the evidence in the courtroom such as religious belief, philosophical beliefs, friendships or family relationships or the type of work you do?

21. Have you ever been a witness in a civil matter, regardless of whether it went to trial?
22. Is there anything, whether or not covered in the previous questions, which would affect your ability to be a fair and impartial juror or in any way be a problem for you in serving on this jury?
23. Is there anything else that you feel is important for the parties in this case to know about you?

Respectfully submitted,

CONSOLE MATTIACCI LAW, LLC

Dated: November 30, 2021 BY:

/s/ Lane J. Schiff
Lane J. Schiff, Esquire
Colin Saltry, Esquire,

Attorneys for Plaintiff